

ADONNA FROMETA,

Plaintiff,

-against-

MARIO E. DIAZ-DIAZ, ALL AMERICAN HAULERS
RECYCLING,

Defendants.

Civil Action No.: 07-CV-6372

PROPOSED ORDER

Pursuant to the recent rulings of the Honorable Judge Harold Baer, Jr. defendants respectfully submit the enclosed proposed order:

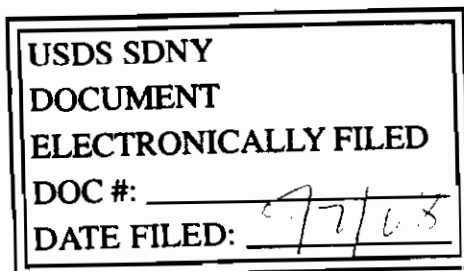
1. Defendants are entitled to take the testimony of plaintiff's treating physicians, Dr.

Davy, Dr. Babu and Dr. Krishna; *and all on or before 5/19/08; AH*
and

2. The depositions of the treating physicians are limited to two (2) hours each; and

3. Defendants can take the deposition of plaintiff's Expert Charles Kincaid pursuant to the Federal Rules of Civil Procedure; and

4. Defendants have two weeks from May 1, 2008 to retain their own rebuttal Expert *to counter* plaintiff's Expert report by Charles Kincaid, which was *provided to A* exchanged on May 1, 2008. *SH*



Harold Baer
Honorable Harold Baer, Jr.